

1 BRIAN J. STRETCH (CABN 163973)  
United States Attorney

2 BARBARA J. VALLIERE (DCBN 439353)  
3 Chief, Criminal Division

4 MICHELLE BAZU (CABN 266964)  
Assistant United States Attorney

5 1301 Clay Street, Suite 340S  
6 Oakland, California 94612  
7 Telephone: (510) 637-3680  
8 FAX: (510) 637-3724  
michelle.bazu@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,	)	Case No.: CR 17-00090 JST
14 Plaintiff,	)	
15 v.	)	<b>STIPULATION AND <del>PROPOSED</del> ORDER</b>
16 DANGELO CURRIE,	)	<b>EXCLUDING TIME FROM MAY 26, 2017 TO</b>
17 Defendant.	)	<b>JUNE 16, 2017</b>
	)	

18  
19  
20 On May 26, 2017, the defendant Dangelo Currie, represented by Angela Hansen, Assistant  
21 Federal Public Defender (special appearance), and the government, represented by Michelle Bazu,  
22 Assistant United States Attorney, appeared before the Honorable Jon S. Tigar for a status conference.  
23 The matter was continued to June 16, 2017 at 9:30 a.m. to set further proceedings.

24 The parties agree to exclude the time between May 26, 2017 and June 16, 2017 from the time in  
25 which the defendant must be brought to trial pursuant to the Speedy Trial Act, 18 U.S.C. § 3131 *et al.*  
26 The government has recently produced discovery, and additional discovery will be produced shortly to  
27 defense counsel. Therefore, the parties agree that the time period of May 26, 2017 and June 16, 2017,  
28 inclusive, should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv) on the basis that

1 the ends of justice served by the continuance outweigh the best interests of the public and defendant in a  
2 speedy trial, and failing to exclude this time would deny counsel the reasonable time necessary for  
3 effective preparation, as well as continuity of counsel, taking into account the exercise of due diligence.  
4

5 DATED: May 26, 2017

6 /s/  
DORON WEINBERG  
Counsel for Dangelo Currie


7  
8 DATED: May 26, 2017

9 /s/  
MICHELLE BAZU  
Assistant United States Attorney

**ORDER**

Based upon the representations of counsel and for good cause shown, the Court finds that failing to exclude the time between from May 26, 2017 through June 16, 2017 would deny counsel the reasonable time necessary for effective preparation, as well as continuity of counsel, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from May 26, 2017 through June 16, 2017 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, **IT IS HEREBY ORDERED** that the time from May 26, 2017 through June 16, 2017 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv).

DATED: May 26, 2017      —

  
HONORABLE JON S. TIGAR  
United States District Judge